

EXHIBIT C

IN THE STATE COURT OF CLAYTON COUNTY
STATE OF GEORGIA

LUIS ROSARIO GUTIERREZ DIAZ,
individually and as surviving spouse of Sonia
Villegas Cervantes, deceased,

Plaintiff,

v.

CLAYTON MHP JONESBORO GA, LLC;
VINEYARDS MANAGEMENT GROUP,
LLC; MIRIAM BRYANT; DOE 1; DOE 2;
and DOE 3,

Defendants.

CIVIL ACTION NO. 2022CY02811

AFFIDAVIT OF MIRIAM BRYANT

I MIRIAM BRYANT, having personally appeared before the undersigned officer duly
authorized to administer oaths, after being duly sworn, state as follows:

1.

My name is Miriam Bryant. I am over the age of 21 years old and am competent to make
this Affidavit. The facts set forth in this Affidavit are based on my personal knowledge and are
true and correct.

2.

I am an employee of Vineyards Management Group, LLC. Since August 2021, I have
worked continuously as the Community Manager for Vineyards Management Group, LLC, the
entity that manages Clayton Village Mobile Home Park, located at 6347 Tara Boulevard,
Jonesboro, Georgia 30236.

3.

My job duties as Community Manager include paperwork related to the leasing of units to tenants, collection of rent from tenants, general management of a leasing office for the property during normal business hours, management of dispossession processes, and contacting appropriate contractors to address certain limited maintenance issues, including HVAC repair and maintenance, lawn care service, and cleaning and repair of vacated units to prepare them to be rented to new tenants.

4.

None of my job responsibilities as Community Manager have involved fencing or gating of the property, controlling ingress or egress onto the property, or monitoring traffic into and out of the property.

5.

Streetlights on the property are owned and controlled by Georgia Power. If I receive a report of a problem with one of the streetlights, I report the issue to Georgia Power.

6.

I do not maintain an office located on the property itself. I work out of a leasing office located less than 3 miles from the property. I do not work evenings or overnight hours at the property or in the off-site leasing office. This has been true since I first became manager in August 2021.

7.

I do not, and did not at any time, direct or participate in security at Clayton Village Mobile Home Park. All decisions regarding the engagement of security services and/or implementation

of security measures on the property are made by Vineyards Management Group, LLC's home office, not by the Community Manager.

8.

I have never resided at Clayton Village Mobile Home Park.

9.

I was out of the country on leave, and was not present in the state of Georgia on April 20, 2022.

10.

I was out of the country on leave, and did not work at Clayton Village Mobile Home Park or at the off-site leasing office on April 20, 2022.

11.

I was not present at Clayton Village Mobile Home Park at any time on April 20, 2022.

12.

I did not witness, and have no direct personal knowledge of, the incident underlying this lawsuit.

This 28th day of September, 2023.

Miriam Bryant
MIRIAM BRYANT

Sworn to before me this
28th day of September, 2023

Donna T. Carroll
Notary Public
My Commission Expires:

